

# EXHIBIT G

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
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This document relates to:

*August Bernaerts, et al. v. Islamic Republic of Iran*, No. 1:19-cv-11865 (GBD) (SN)

**DECLARATION OF FAMILIAL RELATIONSHIP**

I, Janice Dukes, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Janice Dukes, and I was the fiancé and life partner of Donnie Taylor (“Donnie”) who died on September 11, 2001 (“9/11”) when the World Trade Center collapsed. I submit this Declaration to demonstrate I was the functional equivalent of Donnie’s spouse.

2. Donnie and I met in 1988. We were friends for several years and began dating in February 1994. In July 1994, Donnie and I began living together and did so until Donnie’s tragic death on 9/11. *See* Verizon bills and ConEd bill attached as Exhibit 1.

3. We got engaged in February 2001 and Donnie bought me a ring in August 2001. I told my family about our engagement, and they were thrilled for us. My sons thought Donnie treated me beautifully and looked forward to officially welcome him into the family. Donnie and I could not have been more excited to spend the rest of our lives together as husband and wife. We planned to get married in 2002, but we unfortunately did not have a chance to set a date or plan our wedding before Donnie passed away.

4. As life partners, Donnie and I both contributed financially to our life together. We had two joint credit cards (*see* Exhibit 2) and shared common household expenses. Donnie paid the rent, I paid the phone, light, gas, and cable bills, and we both paid for food.

5. At the time of Donnie's death, we lived together and shared our lives. We were engaged to be married and planned to be together forever. We shared dreams and were the love of each other's lives. *See* Exhibit 3 for photos. While Donnie and I were not yet legally married, we were committed to each other as husband and wife and had a relationship akin to a married couple. In fact, my co-workers told me that Donnie and I acted like newlyweds. *See* October 1, 2001 New York Times article attached as Exhibit 4. The years Donnie and I spent together were the best years of my life, and I am sure Donnie felt the same. Whether it was going on an adventure or cooking and doing laundry, we had the best time together.

6. Donnie and I enjoyed, among other things, going out for dinner and a movie. While we liked to try new restaurants, Donnie and I had our favorite places we frequented. We loved Mexican food and enjoyed going to a place called Rosa's, where we enjoyed their chimichangas.

7. There is no doubt that Donnie and I were family. We celebrated holidays together every year and attended family gatherings and were close with each other's families. We spent every other weekend with his children, and I had a very nice relationship with them. We had a joint birthday celebration for my niece and Donnie's son and took them to the Central Park Zoo. Donnie's children loved going to my sister's house, who cooked for them and had children around their age with whom they played.

8. I received workers' compensation (*see* Exhibit 5), funds from the Aggregate Trust Fund of the New York State Insurance Fund (*see* Exhibit 6), and proceeds from the September 11<sup>th</sup> Victim Compensation Fund award (*see* Exhibit 7). I was also the Administratrix of Donnie's Estate. *See* Exhibit 7.

9. Upon hearing news of the terrorist attack at the World Trade Center, I prayed Donnie would be found alive. I did not want to believe the love of my life left this world so suddenly and unexpectedly, but I eventually had to accept the terrible truth that Donnie was really gone.

10. When I woke up on 9/11, I never imagined I would never see Donnie again. After all, we were engaged to be married and looked forward to spending the rest of our lives together. Donnie was stolen away from me, and I feel his loss every day and share fond memories of him.

11. Donnie and I shared our lives as committed life partners with the deepest love for one another. We considered each other to be family. Accordingly, I should be deemed the functional equivalent of Donnie's spouse.

Executed on: 10/20/2021

Name (Signature): Janice Dukes

Name (Print): Janice Dukes

# EXHIBIT 1



Account Number

Bill Period

Verizon

Sep 13 - Oct 12, 2001

Page 1 of 5

Q11

Q11

To enroll in the Verizon

**Direct Payment Option** please read  
and sign the agreement on the  
reverse side of the payment form  
below.

Janice Dukes

Manhattan NY

**Order or Bill Information**

Toll Free in NY State

890-1550

**Payment Information**

Toll Free in NY State

890-2100

TTY/TDD see page 4

**Other Bill Questions?**

Call the number shown  
on the detail page for  
that company.

**ACCOUNT SUMMARY**

amount total

Previous Balance \$60.57

Payment Received 9/17 -- Thank You 60.57 cr

Balance as of 9/17 \$0.00

**New Charges**

Verizon Basic Local Services page 2 \$47.03

Verizon Calls page 2 5.83

Verizon Optional Services page 3 31.58

Total New Charges Due by October 9, 2001 \$84.44

**Total Amount Due****\$84.44**

cancelled  
on 7/30/01  
D.B.T.

Account Number

Bill Period

Verizon

Jul 13 - Aug 12, 2001

Page 1 of 4

Q11

Q11

To enroll in the Verizon

**Direct Payment Option** please read  
and sign the agreement on the  
reverse side of the payment form  
below.

Donnie Taylor

New York NY

**Order or Bill Information**

890-1550

**Payment Information**

890-2100

TTY/TDD see page 3

**Other Bill Questions?**

Call the number shown  
on the detail page for  
that company.

**ACCOUNT SUMMARY**

amount total

Previous Balance \$76.81

Payment Received 7/3 -- Thank You 76.81 cr

Balance as of 7/17 \$0.00

**New Charges**

Verizon Basic Local Services page 2 \$48.73

Verizon Calls page 2 .53

Verizon Optional Services page 3 21.07

Total New Charges Due by August 7, 2001 \$70.33

**Total Amount Due****\$70.33**



Service to: **DONNIE TAYLOR**  
at: [REDACTED]

**BILLING SUMMARY AS OF 09/13/01**

Amount due last bill...	\$78.00
Payments through 09/11	\$78.00
Balance remaining.....	NONE

<b>SEP 12 2001</b>	
<b>LEVEL BILLING AMOUNT...</b>	<b>\$78.00</b>

<b>TOTAL AMOUNT NOW DUE...</b>	<b>\$78.00</b>
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**IMPORTANT MESSAGES**

With 09 month(s) remaining, your Level Billing Amount billed to date of \$234.00 is \$41.14 less than your Actual Charges to date of \$275.14. To stay current on your Level Billing Plan, please pay the Total Amount Now Due of \$78.00. Were you not on the Level Billing Plan, the balance due at this time would be \$119.14.

~~To avoid a 1.5% monthly late payment charge, pay the Total Amount Due by OCT 09, 2001.~~

During this billing period, Con Edison customers experienced a record number of days with temperatures in the 90's. Hot weather increases the use of air conditioning and causes appliances like refrigerators to work much harder. As a result, your summer electric bills may be higher. In the current bill period, you used 11.87 kWh a day, compared to last year's daily use of 11.00 kWh a day.

Thank you for your payment.



Keep this part for your records. See reverse side for additional information.

[www.coned.com](http://www.coned.com)

# **EXHIBIT 2**



**FIRST CARD®****Payment Coupon**

Account number [REDACTED]

New Balance \$4,978.00  
Minimum Payment Due \$98.00  
Payment Due Date JULY 15, 2001

Amount enclosed \$ [REDACTED]

Please make checks payable to First USA Bank, N. A.  
First USA Bank, N. A. is the issuer of this account.  
Send top portion of statement with payment in enclosed envelope.FIRST USA BANK, NA  
P.O. BOX 15153  
WILMINGTON DE 19886-5153DONNIE B TAYLOR  
JANICE P DUKES  
NEW YORK NY [REDACTED]

60447

☐ Address or E-mail change? Check here and complete the reverse side.**FIRST CARD**Closing Date JUNE 20, 2001  
Account [REDACTED]

Page 1 of 2

**Visa® Gold Statement**Payment Due Date  
Minimum Payment DueJULY 15, 2001  
\$98.00**Account Summary**

Previous Balance	\$5,004.42	Total Credit Line	\$5,000.00
Transactions	21.95	Total Available Credit	\$0.00
Payments & Credits(-)	98.00	Cash Limit †	\$5,000.00
Finance Charges	49.63	(a portion of your credit line)	
<b>New Balance</b>	<b>\$4,978.00</b>	Cash Available	\$0.00

YOUR ACCOUNT IS CURRENTLY CLOSED

**Transactions**

Date	Description	Amount
06/07	PAYMENT - THANK YOU	- 98.00
06/16	# AOL*ONLINE SERVICE 0601 800-679-9444 VA	21.95
06/20	PERIODIC RATE *FINANCE CHARGE*	49.63

**Finance Charge**

PERIODIC RATE(S) AND APR(S) MAY VARY

Rate Category	Corresponding annual percentage rate	Periodic rate 33 days in period	Corresponding finance charge balance Current	Previous	Finance charge
Purchases	11.00%	.03014%	3,173.37	0.00	31.56
Advances	11.00%	.03014%	1,816.91	0.00	18.07

**FINANCE CHARGE\***

\$49.63

**ANNUAL PERCENTAGE RATE**

11.93%

† Cash Advance Credit Line is a portion of your total Credit Line.

\*See reverse side for explanation and important information.

**FIRST CARD****Payment Coupon**

Account number [REDACTED]

Please make checks payable to First USA Bank, N. A.  
First USA Bank, N. A. is the issuer of this account.  
Send top portion of statement with payment in enclosed envelope.

New Balance  
Minimum Payment Due  
Payment Due Date

\$4,798.76

\$98.00

OCTOBER 16, 2001

Amount enclosed

\$ [REDACTED]

FIRST USA BANK, NA  
P.O. BOX 15153  
WILMINGTON DE 19886-5153



XXXXXXXXXXXXXXXXXXXX  
DONNIE B TAYLOR  
JANICE P DUKES

37300

NEW YORK NY [REDACTED]  
XXXXXXXXXXXXXXXXXXXX

☐ Address or E-mail change? Check here and complete the reverse side.

0-146  
1-2**FIRST CARD**

Closing Date SEPTEMBER 21, 2001  
Account [REDACTED]

Page 1 of 1

Payment Due Date  
Minimum Payment Due

OCTOBER 16, 2001  
\$98.00

**Account Summary**

Previous Balance	\$4,875.64	Total Credit Line	\$5,000.00
Transactions	0.00	Total Available Credit	\$0.00
Payments & Credits(-)	121.94	Cash Limit †	\$5,000.00
Finance Charges	45.06	(a portion of your credit line)	
<b>New Balance</b>	<b>\$4,798.76</b>	Cash Available	\$0.00

YOUR ACCOUNT IS CURRENTLY CLOSED

**Transactions**

Date	Description	Amount
09/05	* OPENING BAL ADJUSTMENT-PURCHASES	- 23.90
09/05	* *FINANCE CHARGE* PREV CYCLE PURCHASES	- 0.04
09/06	PAYMENT - THANK YOU	- 98.00
09/21	PERIODIC RATE *FINANCE CHARGE*	45.06

**Finance Charge**

PERIODIC RATE(S) AND APR(S) MAY VARY

Rate Category	Corresponding annual percentage rate	Periodic rate 31 days in period	Corresponding finance charge balance Current	Previous	Finance charge
Purchases	11.00%	.03014%	3,007.47	0.00	28.10
Advances	11.00%	.03014%	1,815.52	0.00	16.96

**FINANCE CHARGE\***

\$45.06

**ANNUAL PERCENTAGE RATE**

11.21%

† Cash Advance Credit Line is a portion of your total Credit Line.

\*See reverse side for explanation and important information.

**Customer Service**

1-877-272-VISA (Within U S)  
1-847-888-6600 (Outside U S collect)  
1-800-955-8060(TDD)

**Account Inquiries**

P O BOX 8650  
WILMINGTON DE 19899-8650

**Payment Address**

P.O. BOX 15153  
WILMINGTON DE 19886-5153

## Statement for account number [REDACTED]

**FIRST CARD®**

New Balance	Payment Due Date	Past Due Amount	Minimum Payment
\$4,981.86	01/14/02	\$294.00	\$393.00

Amount Enclosed \$ [REDACTED]

Make your check payable to First USA Bank, N.A.  
New address or e-mail? Print on back.

FIRST USA BANK, NA  
P.O. BOX 15153  
WILMINGTON DE 19886-5153

DONNIE B TAYLOR  
JANICE P DUKES  
NEW YORK NY [REDACTED]

5013778

**FIRST CARD®**

Statement Date: 11/21/01 - 12/20/01  
Payment Due Date: 01/14/02



**CUSTOMER SERVICE**  
(in U.S.) 877-272-VISA  
(call collect outside U.S.)  
1-302-594-8200  
(in Espana)  
1-888-446-5308  
(TDD) 1-800-955-8060

**VISA ACCOUNT SUMMARY**

Account Number: [REDACTED]

Previous Balance	\$4,856.30	Minimum Payment Due	\$393.00
(-) Payments, Credits	\$0.00	Total Credit Line	\$5,000
(+) Purchases, Cash, Debits	\$35.00	Available Credit	\$0
(+) Finance Charges	\$60.56	Cash Access Line	\$5,000
(=) New Balance	\$4,981.86	Available for Cash	\$0.00

**ACCOUNT INQUIRIES**  
P.O. Box 8650  
Wilmington, DE 19899-8650

**PAYMENT ADDRESS**  
P.O. Box 15153  
Wilmington, DE 19886-5153

**TRANSACTIONS**

Trans Date	Reference Number	Merchant Name or Transaction Description	Amount	
			Credit	Debit
12/20		LATE FEE		\$35.00
12/20		*FINANCE CHARGE*		\$60.56

WE CAN HELP YOU KEEP YOUR CREDIT CARD PRIVILEGES! YOU MAY QUALIFY FOR ONE OF OUR CONVENIENT PAYMENT PLANS. WE'LL WORK WITH YOU! CALL 1-800-955-8030 (COLLECT 1-302-594-8200) TODAY.

TO AVOID FINANCE CHARGES ON PURCHASES, PAY THE FULL NEW BALANCE BY THE PAYMENT DUE DATE SHOWN ON YOUR STATEMENT. IF NOT PAID IN FULL, FINANCE CHARGES WILL ACCRUE ON ALL UNPAID BALANCES UNTIL THOSE BALANCES ARE PAID IN FULL. (SEE BACK OF STATEMENT FOR OTHER GRACE PERIOD INFORMATION.)

**FINANCE CHARGES**

PERIODIC RATE(S) AND APR(S) MAY VARY

Category	Daily Periodic Rate 30 days in cycle	Corresponding APR	Average Daily Balance		FINANCE CHARGES
			Previous Cycle	Current Cycle	
Purchases	.04107%	14.99%	\$0.00	\$3,055.53	\$37.65
Cash advances	.04107%	14.99%	\$0.00	\$1,559.97	\$22.91
Total finance charges					\$60.56



Statement for account number: [REDACTED]

**FIRST CARD®**

New Balance	Payment Due Date	Past Due Amount	Minimum Payment
\$4,648.08	03/17/02	\$0.00	\$92.00

Amount Enclosed \$

\*

Make your check payable to First USA Bank, N.A.  
New address or e-mail? Print on back.

JANICE P. DUKES

NEW YORK NY [REDACTED]

5012434

FIRST USA BANK, NA  
P.O. BOX 15153  
WILMINGTON DE 19886-5153

**FIRST CARD®**

Statement Date: 01/22/02 - 02/20/02  
Payment Due Date: 03/17/02



**CUSTOMER SERVICE**  
(In U.S.) 877-272-VISA  
(call collect outside U.S.)  
1-302-594-8200  
(en Español)  
1-888-446-3308  
(TDD) 1-800-955-8060

**ACCOUNT INQUIRIES**  
P.O. Box 8650  
Wilmington, DE 19899-8650

**PAYMENT ADDRESS**  
P.O. Box 15153  
Wilmington, DE 19886-5153

**VISA ACCOUNT SUMMARY**

Account Number: [REDACTED]

Previous Balance	\$5,082.75	Minimum Payment Due	\$92.00
(-) Payments, Credits	\$494.00	Total Credit Line	\$5,000
(+) Purchases, Cash, Debits	\$0.00	Available Credit	\$0
(+) Finance Charges	\$59.33	Cash Access Line	\$5,000
(=) New Balance	\$4,648.08	Available for Cash	\$0.00

**TRANSACTIONS**

Trans Date	Reference Number	Merchant Name or Transaction Description	Amount	
			Credit	Debit
02/03	7436610DJ015MLBPP	PAYMENT - THANK YOU	\$494.00	
02/20		*FINANCE CHARGE*		\$59.33

**FINANCE CHARGES**

PERIODIC RATE(S) AND APR(S) MAY VARY

Category	Daily Periodic Rate	Corresponding APR	Average Daily Balance		FINANCE CHARGES
			Previous Cycle	Current Cycle	
Purchases	30 days in cycle .04107%	14.99%	\$0.00	\$2,966.63	\$36.54
Cash advances	.04107%	14.99%	\$0.00	\$1,849.06	\$22.79
Total finance charges					\$59.33

Effective Annual Percentage Rate (APR): 14.99%

Grace Period Type: B (Please see back of statement for the Grace Period explanation.)

The Corresponding APR is the rate of interest you pay when you carry a balance on purchases or cash advances.  
The Effective APR represents your total finance charges - including transaction fees such as cash advance and balance transfer fees - expressed as a percentage.

**IMPORTANT NEWS**

**HOTEL SAVINGS OF 15-30% OFF THESE NATIONAL HOTEL CHAINS!**  
DAYS INN:800-268-2195, HOWARD JOHNSON:800-769-0939, RAMADA:  
800-462-8035, TRAVELODGE:800-545-5545, WINGATE INN:877-202-  
8814, AMERIHOTEL:800-996-2087, VILLAGER:888-821-5779. SOME  
RESTRICTIONS APPLY. ADVANCE RESERVATIONS REQ'D. USE ID#20042

**HEALTHY PAWS LETS YOU PROVIDE QUALITY MEDICAL INSURANCE  
FOR YOUR CAT OR DOG! YOU CHOOSE THE VETERINARIAN! SUBJECT  
TO POLICY ELIGIBILITY, TERMS AND EXCLUSIONS. TO APPLY CALL  
1-866-640-0114. NOT INSURED BY FDIC OR OTHER FEDERAL  
GOVERNMENT AGENCY, NO BANK GUARANTEE, NOT A DEPOSIT.**

*This bill is now  
in my name*

**DIRECT MERCHANTS BANK®**

P.O. BOX 29438, PHOENIX, AZ 85038-9438

MasterCard

VISA

October 26, 2001

DONNIE B TAYLOR

NEW YORK NY



ACCOUNT NO: [REDACTED]  
 BALANCE: \$7,268.73  
 AMOUNT DUE: \$194.00

Dear Donnie B Taylor,

Payment has not been received on your account within the last forty-five (45) days. Please be advised that a payment must be posted to your account within fifteen (15) days of the date of this letter. Failure to make payment on this account within that time period could result in your account being removed from our CCCS program. Please contact us immediately to make payment arrangements on your account, thereby ensuring your continued participation in our CCCS program. If your account is removed from our CCCS program, your interest rate will revert to the terms disclosed in your cardmember agreement, as stated in our initial CCCS confirmation letter. The delinquency on this account will continue to accrue until payment is made to bring your account current.

To expedite the receipt of your payment, please take advantage of our phone pay feature by calling us at 1-800-435-1415. You may also expedite a payment through a Western Union Quick Collect.

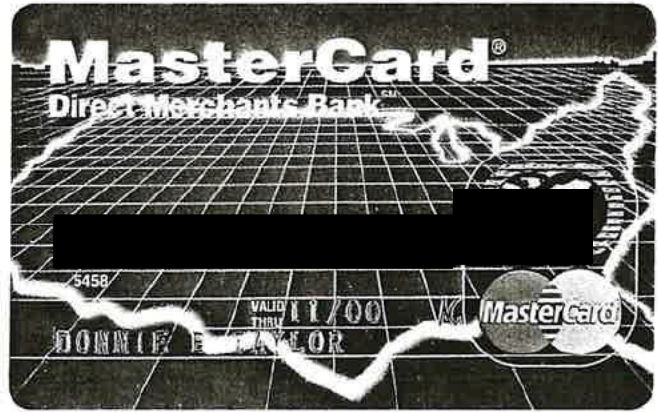
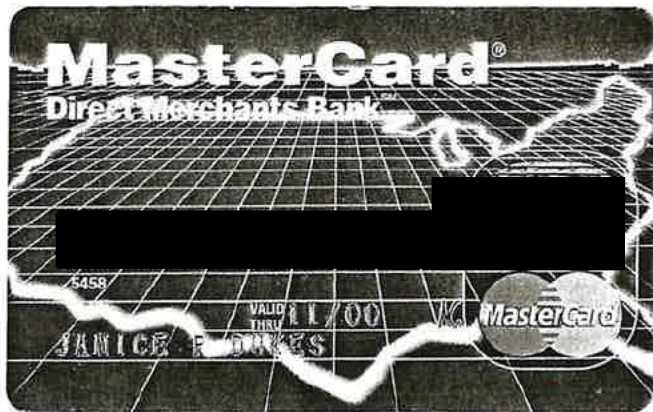
If we can be of further assistance to you, please feel free to give us a call at 1-800-435-1415.

Sincerely,

Direct Merchants Credit Card Bank, N.A.  
 1-800-435-1415

This communication is for the purpose of collecting a debt and any information obtained will be used for the collection of that debt.

The Direct Merchants Bank Mastercard® is issued by Direct Merchants Credit Card Bank, N.A., Scottsdale, Arizona.



# **EXHIBIT 3**





**Janice and Donnie at Holiday Party  
1994**



**Janice and Donnie in their Apartment  
2000**



**Janice and Donnie in Donnie's Office  
1994**



7/27/97

My Granddaughter & Simone  
Our Apartment (Donnie's daughter)



7/27/97

My Granddaughter & D.J.  
Our Apartment (Donnie's Son)

D.J.  
→  
Birthday  
Party  
at my  
Sister's  
house



Simone  
← (Donnie's Daughter)  
My Granddaughter  
←

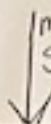




A Day at the Park (Central Park)  
Donnie Sr.  
Janice  
DJ - Donnie's Son  
Simone - Donnie's daughter  
Shanë - my granddaughter

My Granddaughter's  
1<sup>st</sup> Birthday Party

my Niece  
Shantell

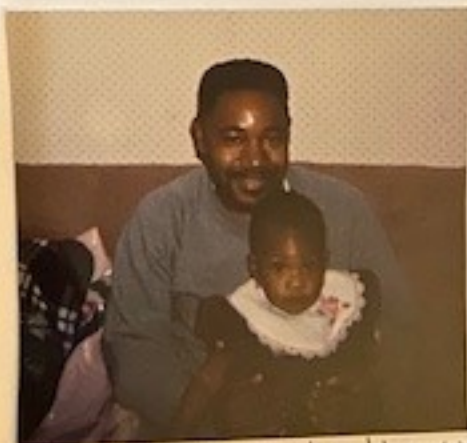


Simone  
D. Daughter

Shane  
my Granddaughter



Simone Shantell Shantell  
Donnie's Daughter My Granddaughter My Niece



Donnie + My Granddaughter  
Shane



Simone  
&  
Shane  
AT  
the  
Park



Simone Shantell Shane & DS



This is a picture of our picture wall. The big picture in the middle is Donnie & me. Year 1995



# EXHIBIT 4

# Help to Make Ends Meet on Only One Salary

By AARON DONOVAN

As Donnie Taylor walked to the door of his apartment on the morning of Sept. 11, he was accompanied by Janice Dukes, who bade him goodbye as she did every morning, with a kiss. "O.K., Dukes," Mr. Taylor said, "have a good day and I'll talk to you later."

It was the last time she saw him.

"This is the longest we've been separated since we've been together," Ms. Dukes said, alluding to the fact that she has not lost hope that he'll be found somehow.

9/11  
NEEDIEST  
FUND

Mr. Taylor, 40, was an office manager for the Aon Corporation, on the 102nd floor of the World Trade Center's south tower. Ms. Dukes, 50, works in Midtown as a telecommunications specialist.

They never had a formal ceremony, but the two considered each other husband and wife. They lived together for seven years, but Ms. Dukes's co-workers at HQ Global Workplaces told her they acted like newlyweds. They would talk on the phone three or four times a day to see how things were going.

She made her first call of the day to him a few minutes before the first plane hit the trade center, and got his voice mail. "Hi, babe, I just want to let you know I'm here," she said. "When you get a chance, give me a call. I love you."

She does not know if he got the message. As soon as she found out that his tower had been hit, she left work and tried to make it downtown. The subway took her as far as 18th Street and Seventh Avenue. From there, she walked amid crowds of people who had left their offices and she saw smoke pouring from the collapsed towers, but she did not see him. When she returned home, Ms. Dukes waited for Mr. Taylor to come back, hoping that he was merely delayed because he was making the long walk to their apartment, on East 129th Street in Harlem.

Mr. Taylor's co-workers have told Ms. Dukes that after the first tower was hit, Mr. Taylor went around the office encouraging people to leave.

Mr. Taylor's absence has been felt by Ms. Dukes, and by her nephew Eric, who attended a grief counseling session run by the Children's Aid Society. Eric Dukes asked Denise Taylor, the bereavement counselor, if she would speak with his aunt.

Ms. Dukes called for an appointment, and the two spoke for three hours. Ms. Taylor found that compounding Ms. Dukes's grief was her fear that she would not be able to pay the \$662 monthly rent on her one-bedroom apartment. In the past, Mr. Taylor had paid the rent while she



Nancy Siesel/The New York Times

Janice Dukes in the Harlem apartment that she shared with Donnie Taylor, who never returned from work at the World Trade Center. Co-workers said that after seven years together, the couple still acted like newlyweds.

paid the utility bills.

Ms. Taylor asked the agency, one of the 10 local charities supported by The New York Times 9/11 Neediest Fund, to help Ms. Dukes, who earns \$778 every other week, pay her rent. The agency paid her rent for September and October, and said it could do so for November if she wanted. That eased a tremendous burden for Ms. Dukes, who had been having visions of her belongings being put on the sidewalk at the same time that she was beginning to realize that Mr. Taylor might not return home again.

Ms. Dukes said she was going to try to continue living in the apartment and make ends meet on her own, but even with the couple's combined income, it had been hard. When they received their tax rebate this spring, they used it to stock up on groceries.

It is at the apartment where she has the strongest connection to the way her life used to be. It is there that she has all the plants that Mr. Taylor doctored back to life, the blue and green parakeets that he kept as pets, and a portrait of the couple, smiling, that hangs on their living room wall.

Ms. Dukes said she was grateful for the help but saddened that she needed it. The two had talked about having a wedding but had not yet set a date. "I would rather have Donnie back than to have any money," she said. "If he could come walking through that door I would be so happy."

*New York Times*  
Monday October 1, 2001

# **EXHIBIT 5**

LAW OFFICE OF

**ALAN M. CASS & ASSOCIATES**

225 BROADWAY • SUITE 1505  
NEW YORK, N.Y. 10007

ALAN M. CASS  
EDWARD HILFER  
ALYSON E. HINTON

—  
DAVID RIFKIN

—  
STEVE COHEN  
LICENSED REPRESENTATIVE

ANITA ORECKINTO  
OFFICE MANAGER

PARALEGALS  
DELLY POLANCO LEON  
VIGDALY GERMAN  
ARVIND GALABYA

TEL. (212) 349-3420  
FAX (212) 349-3462

DONNIE (DECEASED) TAYLOR  
C/O JANICE DUKES  
[REDACTED]

NEW YORK, NY [REDACTED]

January 24 , 2004

W.C.B.# : 00155100  
Claimant : TAYLOR, DONNIE (DECEASED)  
Employer : AON CORPORATION  
Carrier : TRANSCONTINENTAL INS. (CNA)  
Claim # : 9998-0003-01-1118  
D/A : 09/11/2001  
Soc Sec # : [REDACTED]  
Our Case #: 0026137

Dear Ms. Dukes:

I am pleased to inform you that we were successful in the finding being made that you were a domestic partner of Donnie Taylor at the time of his death. Once again, I want to send my condolences to you and your family. As a result of this award it appears that approximately \$25,268 is moving to you retroactively. In addition, you will get biweekly checks of \$440. An attorney's fee of \$3,000 is being deducted from the initial payment for our attorney's fee.

It has been a pleasure to represent you in this case. If I could be of any service to you or your friends, please feel free to contact me in the office.

Very truly yours,

  
ALYSON HINTON ESQ.

cp 502/C80

## Copies To:

Claimant:

Carrier:

Employer:

Attorney/Representative:

Donnie Taylor (dec'd)

Transcontinental Ins Co

Aon Corporation

Cass, Alan

Richard Creditor

Grey and Grey, Esquires

Cambridge Integrated Services

Sarah Taylor

Simone Taylor c/o

Donnie Brooks Taylor Jr. c/o

Janice Dukes

Janice Dukes

New York, NY

|||||

**NOTICE TO INJURED WORKER**

1. Any compensation due will be sent to you by check by the employer or insurance carrier.
2. Keep a careful record of the payments received in order that you may have evidence of payment or nonpayment in case of dispute.
3. Do not pay anything to anyone representing you. If you hire a lawyer or licensed representative, the fee will be set by a W.C.Law Judge. The fee will be deducted from your award and paid by separate check directly to the lawyer or licensed representative by the employer or the insurance carrier.
4. Except for Volunteer Firefighters' and Volunteer Ambulance Workers' claims, no lost wage benefits are paid for the first seven days of disability unless the disability extends beyond 14 days.
5. If your case was continued and the Judge directed that your benefits are to continue, the insurance company or self-insured employer must keep paying you until :
  - (a) you have another hearing and the Judge stops or changes your benefits
  - or
  - (b) your employer or insurance company has evidence that you have returned to work at regular pay or a report from your doctor stating you have no disability and submits this evidence to the Workers' Compensation Board.
6. If you wish to appeal any part or all of the Judge's decision, your appeal must be in writing and received by the Board within 30 days of the filing date of this decision. The filing date is on the other side of this form in the lower right-hand corner. You may deliver your appeal in person to the District office or send it by mail.
7. If you have any further questions, you may contact your district office by mail or by telephone. The address of your district office is:

STATE OF NEW YORK  
WORKERS' COMPENSATION BOARD  
PO BOX 5205  
BINGHAMTON, NY 13902-5205

Phone Number: (800) 877-1373





Jeffrey R. Sweet  
Acting Chairman

STATE OF NEW YORK  
WORKERS' COMPENSATION BOARD  
PO BOX 5205  
BINGHAMTON, NY 13902-5205  
[www.wcb.state.ny.us](http://www.wcb.state.ny.us)  
(800) 877-1373

## State of New York - Workers' Compensation Board

In regard to Donnie Taylor (dec'd ), WCB Case #0015 5100

### AMENDED RESERVED DECISION

*keep for your records*

This decision amends the Reserved Decision made by Judge William Griff previously filed on 01/02/2004 involving the claim of Donnie Taylor (dec'd ):

December 26, 2003

This case arises of out the World Trade Center.

The present issue is the claim of Janice Dukes for domestic partnership benefits.

By decision filed 10-16-03 it was found that decedent had two children who were entitled to dependent benefits.

It should also be noted that at the time of his death the parties concede that decedent had been divorced from his former wife, Sarah Taylor. The Board file contains a judgment of divorce filed on 9/8/00.

Claimant stated that she had and the decedent started going out in February, 1994. At the time of his divorce and up until 9/11/01 they lived together. She was employed as a telecommunication specialist and earned approximately \$27,000 in 2001. They apparently shared common expenses: he paid the rent bill (about \$662.50) and she paid the gas, light, and cable and phone bills; in all claimant testified that she contributed \$400 or \$500 per month towards the household.

It appears that the decedent did have a savings account with only his name on it; the claimant did not have any joint property with the decedent. Claimant and decedent did have a common credit card which was used to buy household and family items.

Claimant also testified that decedent had proposed to her and had given her a ring; they had tentative plans to be married in 2002.

Upon a review of the entire file I find that claimant is entitled to benefits as the domestic partner of the decedent. The claimant testified credibly and her testimony reveals that at the time of decedent's death they had established a

\*\*\* Continued on next page \*\*\*

Claimant -	Donnie Taylor (dec'd )	Employer -	Aon Corporation
Social Security No. -	[REDACTED]	Carrier -	Transcontinental Ins Co
WCB Case No. -	0015 5100	Carrier ID No. -	W209001
Date of Accident -	09/11/2001	Carrier Case No. -	9998-0003-01-1118
District Office -	NYC	Date of Filing of this Decision -	02/17/2004

#### ATENCION:

Puede llamar a la oficina de la Junta de Compensacion Obrera, en su area correspondiente, cuyo numero de telefono aparece al principio de la pagina y pida informacion acerca de su reclamacion(caso).

mutual dependence with respect to household bills and had planned to be married.

Accordingly, claimant is entitled to domestic partnership benefits from 9-12-01 to date and ongoing; for the same period decedent's children are also entitled to benefits. Carrier may take credit for prior payments made to or on behalf of the children; this credit does not include payments made to their mother in her own alleged capacity as surviving spouse of the decedent.

Carrier is to withhold from the share of claimant Dukes the sum of \$3000 as possible attorney fee.

No further action at this time.

#### Summary of Findings

AWARD - THE EMPLOYER OR INSURANCE CARRIER ARE DIRECTED TO PAY AT ONCE AS FOLLOWS:

Initial decision.

The period from 9/12/2001 to 12/26/2003 for 119.4 weeks totaling \$47,760.00 is awarded as follows:

Award to:	Relation	DOB	Pct	Rate / week	Total	Pay to:
Janice Dukes	Spouse	[REDACTED] 1951	36.67%	\$220.00	\$26,268.00	Janice Dukes
Donnie B Taylor	Child	[REDACTED] 1984	15.00%	\$90.00	\$10,746.00	Donnie Brooks Taylor Jr.
Simone L Taylor	Child	[REDACTED] 1986	15.00%	\$90.00	\$10,746.00	Simone Taylor c/o

Carrier Continue Payments bi-weekly in the amount of \$800.00

*Any money previously paid for the above period(s) will be deducted from the total amount.*

DECISION: DECISION AMENDED TO RELEASE ATTORNEY FEE TO ATTORNEY CASS. No further action is planned by the Board at this time.

FEES:

As lien on above award payable by separate check by carrier TO CLAIMANT'S REPRESENTATIVE OR ATTORNEY:

Sum of	To
\$3,000.00	Cass, Alan

Claimant -	Donnie Taylor (dec'd)	Employer -	Aon Corporation
Social Security No. -	[REDACTED]	Carrier -	Transcontinental Ins Co
WCB Case No. -	0015 5100	Carrier ID No. -	W209001
Date of Accident -	09/11/2001	Carrier Case No. -	9998-0003-01-1118
District Office -	NYC	Date of Filing of this Decision -	02/17/2004

#### ATENCION:

Puede llamar a la oficina de la Junta de Compensacion Obrera, en su area correspondiente, cuyo numero de telefono aparece al principio de la pagina y pida informacion acerca de su reclamacion(caso).



# **EXHIBIT 6**



P.O. Box 66699  
Albany, NY 12206  
Aggregate Trust Fund, Unit 997,  
(888) 923-2002

March 11, 2021

Ms. Janice Dukes

[REDACTED]  
New York, NY [REDACTED]

Injured: Donnie Taylor (dec'd)  
WCB# 00155100  
ATF# 96225537-997  
Date of accident: 9/11/01

To whom it may concern:

The above-captioned claimant is receiving \$400.00 weekly from the Aggregate Trust Fund. Payments are issued bi-weekly in the amount of \$800.00

Sincerely,

SJ Sperry  
Claims Services Representative 1  
ATF@nysif.com

# EXHIBIT 7

At a Surrogate's of the  
State of New York held in  
and for the County of New  
York, at 31 Chambers  
Street, New York, New  
York, on October 6<sup>th</sup>,  
2005.

PRESENT:

HON. RENEE R. ROTH,

Surrogate.

-----X  
In the Matter of the Application of

JANICE DUKES,

as Administratrix of the Goods, Chattels  
and Credits Which Were of

DONNIE BROOKS TAYLOR,

Deceased,

for Leave to Collect an Award from the  
September 11th Victim Compensation Fund  
of 2001 and to Hold or Pay the Proceeds  
as Requested Herein.  
-----X

File No. 3988/01

DECREE

05 OCT -7 AM 11:20  
SURROGATE'S COURT  
NEW YORK

Upon the Petition of Janice Dukes ("Petitioner"), as  
Administratrix of the Estate of Donnie Brooks Taylor, deceased  
("Decedent"), duly verified October 5, 2004, and the accounting  
sworn to on October 5, 2004, in which application was made for a  
Decree authorizing and empowering the Administratrix to collect a  
certain award from the September 11th Victim Compensation Fund of  
2001 (the "Award") in the total sum of \$959,071.43; modifying the  
Limited Letters of Administration heretofore issued to permit the  
collection of the Award and the distribution and/or retention of  
the proceeds as proposed in the Petition; dispensing with the

filing of a bond; paying Pavalon, Gifford, Laatsch & Marino, Esqs., out of the proceeds of the Award for non-economic loss the sum of \$1,518.98 for disbursements and to Law Offices of Ann Pinciss Berman P.C., the sum of \$1,500.00 as attorneys' fees and any other expenses of the proceeding; allocating the proceeds of the Award between economic and non-economic loss and distributing them as set forth in the Petition; permitting Petitioner to execute any and all papers necessary to collect the Award and distribute the proceeds; and judicially settling the Account of the Administratrix;

AND more than seven months having expired since the granting of Letters of Administration to Petitioner, and the Surrogate having issued a Supplemental Citation to all persons interested in the Estate of Decedent to attend such judicial settlement on February 8, 2005, at 10:00 a.m., at the Surrogate's Court, New York County;

AND the said Supplemental Citation having been duly returned with proof of service thereof upon the following named persons or corporations, to wit: Donnie Taylor, Jr., and Simone Taylor;

AND Petitioner having appeared by Law Offices of Ann Pinciss Berman P.C., Petitioner's attorneys;

AND Donnie Taylor, Jr., and Simone Taylor having appeared by their attorneys, Finkelstein & Virga P.C., and filed objections to the Petition; and the parties having entered into a Stipulation of Settlement with respect to the objections;

AND the Court having rendered a Decision dated August 11, 2005;

AND the Court having examined the said account and having found the state and condition of said account to be as set forth in the following statement recorded with the Court:

SUMMARY STATEMENT OF SETTLEMENT PROCEEDS

The Administratrix is charged with the proceeds of award from the September 11th Victim Compensation Fund for the wrongful death and conscious pain and suffering of Decedent to be distributed:	\$959,071.43
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TOTAL CHARGES:	\$959,071.43
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The Administratrix is credited with the following amounts:	<u>\$0.00</u>
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TOTAL CREDITS:	\$0.00
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BALANCE OF SETTLEMENT PROCEEDS TO BE DISTRIBUTED:	\$959,071.43
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AND it appearing that Petitioner has fully accounted for all monies and properties of the Estate in said summary statement, and Petitioner having waived any claim to statutory commissions; it is hereby

ORDERED, ADJUDGED AND DECREED, that Petitioner's application for leave to collect, allocate and distribute the Award is granted to the extent set forth below; and it is further

ORDERED, ADJUDGED AND DECREED, that Petitioner, as Administratrix of Decedent's Estate, is authorized to collect a certain award from the September 11th Victim Compensation Fund of 2001 in the total sum of \$959,071.43, and Petitioner is authorized to deliver general releases and discontinuances and any other

papers or documents that may be required to collect the Award and distribute the proceeds; and it is further

ORDERED, ADJUDGED AND DECREED, that the entire settlement sum of \$959,071.43 be paid as follows:

1. To Law Offices of Ann Pinciss Berman P.C., as payment of attorneys' fees for professional services rendered in this proceeding \$1,500.00
2. To Pavalon, Gifford, Laatsch & Marino, Esqs., as reimbursement for disbursements incurred by them in prosecuting the Claim \$4,843.27
3. To Janice Dukes, in satisfaction of her claim against the Estate \$159,071.43
4. To Donnie Taylor, Jr., as and for his intestate share as distributee \$396,828.36
5. To Simone Taylor, as and for her intestate share as distributee \$396,828.37


and it is further

ORDERED, ADJUDGED AND DECREED, that upon Petitioner's making payments as aforesaid, Petitioner, as Administratrix of Decedent's Estate, be and hereby is discharged from any and all further liability as to all matters and things embraced in the aforesaid account and determined by this Decree; and it is further

ORDERED, ADJUDGED AND DECREED, that the giving of a bond or other security in connection therewith be dispensed with, and that the restrictions on the Letters of Administration be modified to allow the above settlement; and it is further



ORDERED, ADJUDGED AND DECREED, that the Account of Petitioner,  
as Administratrix, is hereby judicially settled.

  
\_\_\_\_\_  
HON. RENEE R. ROTH

Surrogate

*SURROGATE*

LAW OFFICES

**PAVALON, GIFFORD, LAATSCH & MARINO**

TWO NORTH LA SALLE STREET

SUITE 1600

CHICAGO, ILLINOIS 60602

TELEPHONE: (312) 419-7400

FACSIMILE: (312) 419-7408

www.pgmlaw.com

EUGENE I. PAVALON  
pavalon@pgmlaw.com



October 18, 2005

**VIA FEDERAL EXPRESS**

Ms. Janice Dukes

New York, New York

Re: Estate of Donnie Brooks Taylor  
Victims' Compensation Fund Claim Number: 212-001174  
Surrogate Court's File Number: 3987/01

Dear Janice:

The Surrogate's Court Judge Renee R. Roth finally signed and entered the distribution order for the Estate as per the agreement of the parties at our hearing some months ago, a copy of which order I am enclosing.

Pursuant to that order, you will find our Trust Account check in the amount of \$159,071.43, payable to you.

It was a pleasure to come to know you and to represent you. Hopefully this provides some closure for your loss. I am now closing our file and wish you good health and happiness in the future.

Sincerely,

Eugene I. Pavalon

EIP/tz

Enclosure

cc: Ann Pinciss Berman, Esq.

**PAVALON, GIFFORD, LAATSCH & MARINO**

CLIENT TRUST ACCOUNT  
TWO NORTH LA SALLE, #1600  
CHICAGO, IL 60602

THE PRIVATE BANK AND TRUST COMPANY  
CHICAGO, ILLINOIS 60602  
2-648-710

DATE

NUMBER

AMOUNT

PAY One Hundred Fifty Nine Thousand Seventy One Dollars and -----43/100

TO THE  
ORDER OF

Janice Dukes

10-18-05

\$159,071.43

*Ey Marino*  
AUTHORIZED SIGNATURE



**Donnie Brooks Taylor Sr.**